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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

ORACLE USA, INC., *et al.*,

Plaintiffs,

v.

SAP AG, *et al.*,

Defendants.

CASE NO. 07-CV-01658 PJH (EDL)

**DECLARATION OF BUFFY B. RANSOM IN
 SUPPORT OF PLAINTIFFS' MOTION PURSUANT
 TO 17 U.S.C. § 410(c)**

Date: September 29, 2010
 Time: 9:00 am
 Place: 3rd Floor, Courtroom 3
 Judge: Hon. Phyllis J. Hamilton

1 I, Buffy B. Ransom, declare:

2 1. I am employed by Oracle America, the successor to Oracle USA, one of
3 the Plaintiffs in this action. I am the Vice President of Global Support Services for software
4 products. The statements in this declaration are based on my personal knowledge, and I could
5 and would testify competently to them if called upon to do so.

6 2. I began my employment with J.D. Edwards & Company ("J.D. Edwards")
7 in June 1993. When PeopleSoft, Inc. acquired J.D. Edwards in 2003, I became a PeopleSoft
8 employee. When Oracle acquired PeopleSoft in 2005, I became an Oracle employee. When I
9 joined J.D. Edwards in 1993, J.D. Edwards was an enterprise software company headquartered in
10 Denver, CO. From 1993 until it was acquired by PeopleSoft, J.D. Edwards created and updated
11 enterprise software applications, and licensed those enterprise software applications to its
12 customers. After the acquisition by PeopleSoft, J.D. Edwards has continued to develop and
13 distribute enterprise software applications, as a division of PeopleSoft and then Oracle.

14 3. From 1993 to the present, my job responsibilities have included support
15 services for J.D. Edwards software. As part of my support responsibilities, I have always
16 understood the overall architecture of the J.D. Edwards product lines and have had input into
17 those products over time. Also as part of my support responsibilities, I have supervised other
18 employees who worked with the development organization as it designed and developed the J.D.
19 Edwards software.

20 4. From 1993 through at least 2003, based on my involvement with the
21 development organization at J.D. Edwards, I understood that senior management in that
22 development organization had responsibility for deciding, and control over, the features and
23 functionality for J.D. Edwards software. For example, in 1995 I participated in discussions with
24 special development teams regarding their efforts to add particular features and functionality to
25 J.D. Edwards software. I remember from these discussions that while the developers themselves
26 had discretion in how to design and implement those features and functionality, the development
27 teams worked under direction from senior management within the development organization as
28 to what features and functionality to program.

1 5. In the 1990s, J.D. Edwards' flagship enterprise software product was
2 called J.D. Edwards World. At that time, J.D. Edwards World ran only on IBM System/38 or
3 AS/400 computer servers. Users typically accessed the software through "green screen" dummy
4 terminals. World allowed companies to automate their business processes, including
5 distribution, financial management, human resources and manufacturing processes.

6 6. Starting in approximately 1996, J.D. Edwards began developing a new
7 product it then called J.D. Edwards OneWorld, which is now referred to as EnterpriseOne. J.D.
8 Edwards EnterpriseOne was a re-write of the then-current J.D. Edwards World software version
9 (A7.3) in more modern programming languages. Early versions of J.D. Edwards EnterpriseOne,
10 in sequence, were numbered B732, B7321, B7322, B733, B7331, B7332, XE. EnterpriseOne
11 XE was followed by EnterpriseOne 8.0, 8.9, 8.10, 8.11, 8.11 SP1, and 8.12.

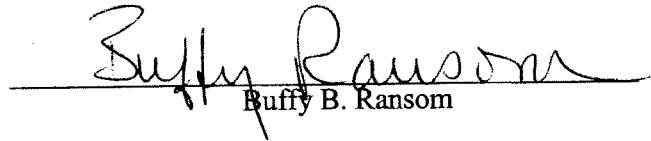
12 7. Since 1993, hundreds of developers have worked to create each new
13 version of J.D. Edwards software. Simultaneously, dozens of developers work to continually
14 address new functionality, fix bugs, and create updates that get sent out to licensed customers for
15 existing versions. On a periodic basis, approximately annually between 1993 and 2003, J.D.
16 Edwards released new versions of its software. Each of these new versions incorporated all or
17 almost all of the new functionality, bug fixes, and updates that had been sent out for the prior
18 version. Each of these new versions therefore reflected the full-time work, over the course of a
19 approximately year, of hundreds of developers adding new features and functionality to the
20 software.

21 8. From 1993 until PeopleSoft's acquisition of J.D. Edwards in 2003, I
22 understood that J.D. Edwards employees signed a standard form of employment agreement that
23 had as one purpose to protect J.D. Edwards' intellectual property. Pursuant to what I understood
24 was the standard human resources policy in place for J.D. Edwards employees between at least
25 1993 and 2003, I reviewed and signed the standard form of employment agreement when I began
26 employment at J.D. Edwards.

27 9. Since at least 1993 and through the acquisition of J.D. Edwards by
28 PeopleSoft, J.D. Edwards' regular practice has been to state, in the software code itself, and

1 documentation, and in release notes, that J.D. Edwards was the owner of J.D. Edwards World,
2 J.D. Edwards EnterpriseOne and J.D. Edwards EnterpriseOne software.

3 I declare under penalty of perjury under the laws of the United States that the
4 foregoing facts are true and correct, and that this Declaration was executed on August 18, 2010,
5 in Redwood Shores, California.

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8 Buffy B. Ransom
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